

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:

ENRIQUE RODRÍGUEZ NARVÁEZ  
MYRNA I. RIVERA ORTIZ

DEBTORS

CASE NO. 18-02044-EAG

CHAPTER 11

**MOTION TO MAKE SALE**

**TO THE HONORABLE COURT:**

COMES NOW Debtor through the undersigned attorney and respectfully requests and prays for the following:

1. On April 16, 2018, Debtors, Enrique Rodríguez Narváez & Myrna I. Rivera Ortiz, filed a voluntary petition for relief pursuant chapter 11 of the Bankruptcy Code.
2. Debtors have a property located at Pedro Albizu Campos Avenue corner Arnaldo Bristol Street St., Guayama, Puerto Rico. The description of the property is:

**REMANENTE 1:** Parcela de terreno radicada en el Barrio Machete del Municipio de Guayama, Puerto Rico, identificada en el plano de mensural con el numero R-Uno (R-1) o Remanente-1, con una cabida superficial de Dos Mil Seiscientos Veintisiete punto Quinientos Cuarenta y uno metros cuadrados (2,627.0541 m/c), en lindes por el NORTE, con la Calle “A-A” dedicado a uso público para calle de acceso y el Solar A-Tres ( A-3); por el SUR, con límites Urbanización Valles de Guayama en varias alineaciones: por el ESTE, con la Carretera Municipal Numero \_\_\_\_; por el OESTE, con Solar A-Dos (A-2) del mismo proyecto.

Registered in the Public Registry of Guayama, Book 459 (Agora), Page 157, 5th inscription, Property no. 11592. Property Identification 420-071-477-60-000.

3. In this case, Debtor requested an appraisal in which the property is valued at \$200,000.00. See, **Exhibit A**. Also, attached as **Exhibit B** is a title study.
4. Debtor received an offer from Mr. Carlos R. García Vélez to purchase. Enclosed as **Exhibit C** is the letter of the offer.
5. As per CRIM’s certification attached herein Debtors owe the amount of \$0.00 attached as

**Exhibit D.**

6. The amount received after deductions from the sale will be used to make a payment to the Chapter 11 Plan.
7. The closing costs will be paid by both parties.
8. The offer is made so that the sale will transfer the property free and clear of any liens.
9. Debtor requests that the present motion announcing the sale of the property be approved. This sale is made in favor of buyers with no attachments or liens.
10. In accordance to section 363(c)(2)(B) of the Bankruptcy code for the approval of this sale with any provision that in accordance to law this Honorable Court deems just and proper.
11. Notice of this sale is given to all parties in interest and unless any objection is received in the next twenty-one (21) days this Honorable Court may approve the same without any need of a hearing.

**WHEREFORE,** Debtor requests that the present motion announcing the sale of the property described above be granted, along with any other procedure that this Honorable Court deems just and proper.

**I HEREBY CERTIFY** that on this same date a copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the participants: U.S. Trustee and all other parties in interest as per the Master Address List.

**NOTICE**

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this motion has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other

response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

In Caguas, Puerto Rico, this September 30, 2020

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